

PATENT

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Date: July 19, 2006

/Rebecca Stanford/
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:

Applicant(s): Praveen Seshadri, *et al.*

Examiner: Harold E. Dodds

Serial No: 10/692,885

Art Unit: 2168

Filing Date: October 24, 2003

Title: PERSONALIZED FOLDERS

**Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450**

REPLY BRIEF

Dear Sir:

Appellants' representative submits this Reply Brief in response to the Examiner's Answer mailed May 19, 2006. In the event any additional fees may be due, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1063 [MSFTP545USB].

A. Regarding the Summary of Claimed Subject Matter

The Examiner's Answer the Examiner asserts that the summary of the claimed subject matter is deficient. In particular the Examiner, while acknowledging that essentially all the limitations are found on page 105, lines 9-17, nevertheless contends that the specification does not explicitly state the limitation "the content of the folders". In order to clarify this issue, and to make explicit that which the Examiner contends is implicit, direct support for the aspect "the content of the folders" can be located at page 5, lines 24-25.

Additionally, the Examiner indicates that most of the elements of claim 30 are found on page 112, lines 1-8 of the specification, but nevertheless contends that the aspect "with respect to one or more named groups of data" is not explicitly found in the locations identified. In order to clarify this issue support for this feature can be found at page 29, lines 18-20.

B. Regarding the Rejection of Claims 1, 2, 5-16, 18, 21, and 23-28 Under 35 U.S.C. §102(e)

Claims 1, 2, 5-16, 18, 21, and 23-28 stand rejected under 35 U.S.C. §102(e) as being anticipated by Knutson *et al.* (US 5,870,746). Reversal of this rejection is requested for at least the following reasons. Knutson *et al.* does not disclose or suggest all elements set forth in the subject claims.

Independent claims 1 and 18 recite similar aspects, namely: ***a plurality of folders comprising links to particular data files stored in the data storage component, the content of the folders controlled at least in part by end-user specified preferences, the folders include any type of link collection defined by a set of relationships***. Knutson *et al.* does not disclose or suggest these exemplary features of appellants' claimed invention.

Knutson *et al.* relates to expert systems and reporting systems, and more particularly to a system and method for generating reports from a computer database. In response to appellants' representative's contention that Knutson *et al.* does not provide ***a plurality of folders comprising links to particular data files stored in the data storage component***, the Examiner asserts that Figures 1 and 2 of the cited document anticipates

appellants' claimed subject matter. (See Examiner's Answer, page 17). Appellants' representative respectfully disagrees. According to the Examiner, Figure 1 consists of three computers designated by numbers 30, 32, and 34 wherein an input device 21 provides an interface for end-users to enter their preferences to a folder management subsystem that resides in a client subsystem 12. It is the Examiner's contention that computer 32 provides a link to computer 34 which contains a data warehouse. The Examiner further is of the opinion that Figure 2, shows that the client subsystem contains the folder management subsystem and a management discovery tool (MDT) administrator interface; that Figure 6 shows use of multiple folders by the MDT; and that col. 44, lines 13-14 provides MDT interprocess messages that have links into both sending and receiving processes. It is submitted that at best the foregoing provides a client subsystem that has as one of its components a folder management system that is linked to both sending and receiving processes, rather than a plurality of folders comprising links to particular data files stored in the data storage component as recited in the subject independent claims.

In response to appellants' assertion that Knutson *et al.* fails to disclose or suggest ***the content of the folders controlled at least in part by end-user specified preferences***, the Examiner contends that col. 43, lines 66-67 teaches the use of content in MDT messages, and in the alternative that col. 32, lines 66-67 and col. 1-45 teaches use of folder objects that are information found in folders. Additionally, the Examiner asserts that the foregoing is "a better representation of the content of folders than the 'folders or data containers that can include or exclude items' found on page 105, line 12 of the Specification." (See Examiner's Answer, page 18). It is submitted that whether or not col. 43, lines 66-67 and col. 32, lines 66-67 are a better representation of the content of folders than the 'folders or data containers that include or exclude items' as found on page 105, line 12 of appellants' specification is not germane to the issue of whether the noted passages disclose the particular aspects for which they are offered. The issue that needs to be addressed is whether the noted passages disclose or suggest that the content of the folders is controlled at least in part by end-user specified preferences. As stated in the Appeal Brief the passages cited by the Examiner fail to disclose or suggest this

particular aspect of the invention as claimed since the noted passages have no cogent relationship to one another sufficient to found such a determination.

In response to appellants' contention that Knutson *et al.* does not disclose or suggest ***the folders include any type of link collection defined by a set of relationships***, the Examiner contends that the set of relationships at col. 12, lines 58-63 refers to metadata relationships. Appellants' representative does not disagree with the Examiner's characterization that col. 12, lines 58-63 provides that one of the four types of fundamental metadata measure relationships that are simple expressions of business causality used to generate supporting information for an InfoFrame to alert a user to trends that run counter to the set of measure relationships. It is nevertheless appellants' contention that this does not disclose or suggest the folders include any type of link collection defined by a set of relationships are recited in the subject claims. Accordingly, reversal of this rejection with respect to independent claims 1 and 18 (and associated dependent claims) is requested.

C. Rejection of Claims 3 and 4 Under 35 U.S.C. §103(a)

Claims 3 and 4 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* in view of Bailey ("On-Event-Condition-Action Language for XML"). Reversal of this rejection is requested for at least the following reasons. Claims 3 and 4 depend from independent claim 1, and Bailey does not cure the aforementioned deficiencies with respect to Knutson *et al.* and independent claim 1. Accordingly, this rejection should be reversed.

D. Rejection of Claims 17 and 29 Under 35 U.S.C. §103(a)

Claims 17 and 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* in further view of Ku *et al.* (US 6,532,471). This rejection should be reversed for at least the following reasons. Claims 17 and 29 depend from independent claims 1 and 18 respectively, and Ku *et al.* does not make up for the deficiencies of Knutson *et al.* with respect to independent claims 1 and 18. Accordingly, this rejection should be reversed.

E. Rejection of Claims 19, 20, and 22 Under 35 U.S.C. §103(a)

Claims 19, 20, and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* in further view of Thuraisingham (US 5,481,700). Reversal of this rejection is requested for at least the following reasons. Claims 19, 20 and 22 depend from independent claim 18, and Thuraisingham does not remedy the aforementioned deficiencies with respect to Knutson *et al.* and the subject independent claim. Accordingly, reversal of this rejection is respectfully requested.

F. Rejection of Claims 30-37 Under 35 U.S.C. §103(a)

Claims 30-37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Knutson *et al.* in further view of Watters (US 6,490,718) and Saxe (US 6,343,376). This rejection should be reversed for at least the following reasons. Knutson *et al.*, Watters and Saxe, either alone or in combination, fail to teach or suggest all aspects set forth in the subject claims.

Independent claim 30 recites *writing user preferences with respect to one or more named groups of data in accordance with a developer schema; executing user preferences in response to an event; and taking action based on a conditionally valid preference*. Neither Knutson *et al.*, Watters nor Saxe, individually and/or in combination, teach or suggest all the novel aspects of appellants' claimed invention.

In response to appellants' assertion that Knutson *et al.* does not teach or suggest *writing user preferences with respect to one or more named groups of data in accordance with a developer schema*, the Examiner contends that the col. 7, lines 30-34 teaches the selection of user preferences via metadata and that col. 11, lines 30-35 provides the use of metadata to handle the communications between the client subsystem and the data abstraction intelligence subsystem. Col. 7, lines 30-34 provides that the client subsystem is suitable for use with operating systems and that a display and input device allow a user to view GUI and enter choices of metadata. While appellants' representative appreciates that entering choices by a user can be equivalent to the writing of user preferences, the claim aspect in its entirety states *writing user preferences with respect to one or more named groups of data in accordance with a developer schema*, meaning that user preferences are written with respect to one or more named groups of

data in accordance with some form of developed schema. The passages cited by the Examiner however do not provide these salient aspects. Accordingly, in view of at least the foregoing, reversal of this rejection with respect to independent claim 30 (and claims that depend there from) is requested.

CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited reference. Accordingly, it is respectfully requested that the rejection of claims 1-37 be reversed.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP545USB].

Respectfully submitted,

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